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March 28, 2025

Hon. Elizabeth S. Stong
United States Bankruptcy Court
Eastern District of New York
Conrad B. Duberstein Courthouse
271-C Cadman Plaza East – Suite 1595
Brooklyn, New York 11201-1800

Debtor: Rosemarie Lopa
Case No.: 1-23-42457-ess
Chapter: 11
Property Address: 283 Nugent Street, Staten Island, NY 10306

Dear Judge Stong:

This firm represents Nationstar Mortgage LLC (“Nationstar”) as servicer for HSBC Bank USA, National Association As Trustee For Structured Adjustable Rate Mortgage Loan Trust, Mortgage Pass-Through Certificates, Series 2007-7, a secured creditor of the above-named Debtor. On November 8, 2023, a Loss Mitigation Order (Doc No. 26) was entered by this Court. We respectfully request that the below serve as a status update on the aforementioned loss mitigation proceeding. The Loss Mitigation conference is scheduled for April 4, 2025 at 10:30 A.M.

A blank loan modification package was sent to Debtor’s counsel on November 30, 2023. Debtor’s counsel provided a complete package on December 7, 2023, which was forwarded to Nationstar.

On January 5, 2024, Nationstar requested additional documentation and written explanation describing the details of hardship. On February 27, 2024, Debtor’s counsel provided the additional documentation, which was sent to Nationstar to review. On April 2, 2024, Nationstar completed the review of the Loan but determined the Loan Modification to be declined due to the following:

- **Proprietary Modification - Declined**

- **Denial Reason:** Insufficient Disposable Income

We are unable to approve you for this solution because after reducing the monthly mortgage payment within the program terms, your disposable income is still negative.

The Debtor has insufficient income to show she can afford a loan modification. The Debtor's Loan Modification application only shows social security income totaling \$1,972.00. At the last Loss Mitigation Status Conference the Court allowed the Debtor one final opportunity to submit a new Loss Mitigation package for review. The Court set a deadline of June 7th for submission of the new package. The Debtor has not complied with the Court's deadline and no new package was received by June 7th, 2024.

The Court set a deadline of June 7th for the Debtor to submit a complete new loss Mitigation package. The Court yet still decided to extend the deadline to June 12th without taking into account Creditor's side. The Court unilaterally extended the deadline to June 12th, and did not care to ask the Creditor how they felt about the extension. The Court set a deadline that was futile and completely unfair to the Creditor. Debtor's Counsel submitted a package on June 12th. **The package is still not sufficient and not very much different from the prior package submitted.**

Debtor's Counsel advised that a new package would be submitted with contributor information. Yet, the package submitted did not include any contributor income, paystubs, tax returns or anything that shows a contributor was being considered in the new application. The new income listed in the RMA is only Social Security income of \$2,030.00 (a mere \$58 difference).

At the Loss Mitigation Status Conference, Debtor's Counsel requested additional time to submit a new package with contributor income. The Court set a deadline for August 1st to submit the package. It is now well past August 1st and Debtor's Counsel has failed to provide any new Loss Mitigation package. There are no further Loss Mitigation options available to the Debtor. The Court has given Debtor more than ample opportunities and at this time there has been no change in the Loss Mitigation review process.

On September 18, 2024, Nationstar requested additional documents as follows:

- Award letter and two months bank statements circling the deposit of the SS income for Rose Marie.
- Proof of income for contributor
- Contributor application completed by contributor
- Proof of occupancy for contributor
- Successors State issued Drivers License

On October 11, 2024, Debtor's Attorney provided requested additional documents, which were forwarded to Nationstar for review. On December 27, 2024, Debtor's Attorney provided the Driver's License for Rose Lopa, which was forwarded to Nationstar on December 30, 2024 for review. Nationstar responded requesting a new Loss Mitigation Package (due to stale documents). Debtor's Counsel was emailed a blank Loss Mitigation package for update. We are awaiting Debtor's Counsel to provide an updated complete Loss Mitigation package for review.

Thank you for your consideration of this matter. Should you have any questions or if I can be of any further assistance, please feel free to contact me.

Respectfully,

/s/ **Suzanne Youssef**

Suzanne Youssef, Esq.

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cc: Alla Kachan, Esq (Via ECF)